

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
W.R. GRACE & CO., et al.,	:	Case No. 01-01139 (JKF)
Debtors	:	
	:	

**DESIGNATION BY SAN DIEGO GAS & ELECTRIC COMPANY, SEMPRA ENERGY
AND ENOVA CORPORATION OF FINAL FACT AND EXPERT WITNESSES;
EXHIBIT LISTS; AND DEPOSITION DESIGNATIONS REGARDING PRODUCT
IDENTIFICATION AND LIMITATIONS PERIODS ISSUES AS DESCRIBED IN
DEBTORS' FIFTEENTH OMNIBUS OBJECTION (RE: CLAIM NO. 11308)**

San Diego Gas & Electric Company, Sempra Energy and Enova Corporation (“Claimants”), pursuant to the Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims dated October 13, 2006, hereby designate final fact and expert witnesses; exhibit lists, and deposition designations regarding the adjudication of product identification and statute of limitations issues as described in Debtors’ Fifteenth Omnibus Objection (Substantive) to Asbestos Property Damage Claims (“Fifteenth Omnibus Objection”) as follows:

Claimants are the current and former lessees of an office building located at 101 Ash Street, San Diego, California, 92101 (the “Building”). The Building is a 21-story high rise that is currently used to house the corporate headquarters of Sempra Energy (“Sempra”), an energy company that owns various energy subsidiaries, including Claimants San Diego Gas & Electric Company (“SDG&E”) and Enova Corporation. Claimants’ books and records establish that the Building contained Monokote-3 fireproofing insulation used to protect the steel structural members of the Building. The Claimants’ proof of claim (which Debtors assigned Claim No. 11308) asserts a claim for the costs to perform spot abatement during various various construction work undertaken throughout the Building and further seek to recover the costs of

additional abatement that will be required as part of any planned current or future remodeling of the Building.

Issues regarding the statute of limitations are affirmative defenses for which the Debtors have the burden of proof. Debtors' objections are presented in broad generalities without reference or citation to specific statute of applicable state law. Accordingly, Claimants reserve the right to amend, supplement or add additional witnesses in response to the evidence or witnesses disclosed by the Debtors or any other property damage claimant. Additionally, Claimants further reserve the right to name additional fact or expert witnesses in rebuttal of any fact or expert witness identified by the Debtors.

A. FACT AND EXPERT WITNESS

1. Fact Witnesses

Sheldon Gladys- 101 Ash Street, San Diego, California, 92101

Mr. Gladys was a facilities manager for San Diego Gas & Electric Company ("SDG&E") who oversaw the 101 Ash Street building ("Building") from the mid-1990's through the mid-2000's. Mr. Gladys will provide percipient testimony concerning the various remodels performed at the Building, asbestos abatement that occurred in relation to the remodels, costs incurred and paid for in the asbestos abatement, the condition of the asbestos in the Building (e.g., that it is in stable form and not deteriorating), and the maintenance and custody of SDG&E's construction records that reflect the use of Debtors' product at the Building. Further testimony may include the history of Buildings, identification of Grace products, the presence of building contaminants associated with the use of those products and surveys and analysis performed on the Building.

Jon Krantz- 101 Ash Street, San Diego, California, 92101

Mr. Krantz is the current facilities manager for the Building. Mr. Krantz will provide percipient testimony concerning the various remodels performed at the Building, asbestos abatement that occurred in relation to the remodels, costs incurred and paid for in the asbestos abatement, the condition of the asbestos in the building (e.g., that it is in stable form and not deteriorating), and the maintenance and custody of SDG&E's construction records that reflect the use of Debtors' product at the Building. Further testimony may include the history of Buildings, identification of Grace products, the presence of building contaminants

associated with the use of those products and surveys and analysis performed on the Building.

Brian Telesmanic- 101 Ash Street, San Diego, California, 92101

Mr. Telesmanic is the Project Manger for SDG&E overseeing the asbestos abatement for the current remodeling project being undertaken at the Building. Mr. Telesmanic can provide percipient testimony regarding the extent of asbestos abatement that has occurred with respect to the current remodeling project, and amounts Claimant has paid to date for the abatement. Mr. Telesmanic can also offer his percipient observations of the condition of the non-abated asbestos at the Building. Further testimony may include the history of Buildings, identification of Grace products, the presence of building contaminants associated with the use of those products and surveys and analysis performed on the Building.

Brian Heramb- 101 Ash Street, San Diego, California, 92101

Mr. Heramb is a Senior Industrial Hygienist for SDG&E who has overseen asbestos abatement at the Building. Mr. Heramb will provide percipient testimony concerning testing at the building, test result findings, and the condition of the non-disturbed asbestos at the Building.

Jay Sheppard- 101 Ash Street, San Diego, California, 92101

Mr. Sheppard is a retired employee of Sempra Energy who oversaw the Building management from the late 1980's through the mid-1990's. Mr. Sheppard may provide percipient testimony concerning the various remodels performed at the Building, asbestos abatement that occurred in relation to the remodels, costs incurred and paid for in the asbestos abatement, the condition of the asbestos in the building, and the maintenance and custody of SDG&E's construction records that reflect the use of Debtors' product at the Building.

2. Expert Witnesses

Steven P. Viani, P.E., ForensisGroup, 3452 East Foothill Blvd., Suite 1160, Pasadena, California 91107-3160

Mr. Vianiis will provide testimony regarding the identification of sampling and testing of Grace products including testimony regarding procedures, methodology and results.

B. EXHIBIT LIST

1. Proof of Claim of San Diego Gas and Electric, Sempra Energy, and Enova Corporation, dated March 27, 2003, and designated by Debtors as claim number 11308, with attachments.
2. Supplemental Submission in Support of Claim No. 11308 by San Diego Gas and Electric, Sempra Energy, and Enova Corporation, dated May 24, 2005, with attachments.
3. Second Supplemental Submission in Support of Claim No. 11308 by San Diego Gas and Electric, Sempra Energy, and Enova Corporation, dated July 29, 2005, with attachments.
4. Amended and Supplemental claim of San Diego Gas and Electric, Sempra Energy, and Enova Corporation, dated March 5, 2007.
4. Expert Report of Steven P. Viani as supplemented with results of site testing.

C. DEPOSITION DESIGNATIONS

1. Deposition of Richard J. Lee, Phd. dated February 14, 2007.
2. Deposition of Roger G. Morse dated March 1, 2007.

Dated: March 13, 2007

By: /S/ Steven T. Davis

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